

the course of investigations. I have worked with the Commission since 2004 and have a B.S. in Accounting and an MBA in Finance.

Bluesheet Data

3. The Bluesheet Management System is an electronic program used by the Commission to obtain trading data (“Bluesheet Data”) from broker-dealers in the securities industry. In the course of my employment, I routinely review Bluesheet Data.

4. Bluesheet Data provide detailed information about securities trades performed by a broker-dealer or its clients. For each trade, Bluesheet Data include, across 68 data fields, information including security name, ticker symbol, trade date, settlement date, trade price, whether the trade is a buy or sell, long or short, the quantity of shares transacted, CUSIP numbers, account numbers, names and addresses, and tax identification numbers for the customers.

Bluesheet Data Reflecting MGT Trading

5. I was asked to review Bluesheet Data for all trades placed in the common stock of MGT Capital Investments, Inc. (ticker: MGT and post-delisting: MGTI) (“MGT”) for the period March 22, 2012 through October 28, 2016. I retrieved that MGT data from the Commission’s Bluesheet Management System (the “MGT Trading Data”). The Bluesheet Data that I retrieved was voluminous, comprising over 10 million trades. I understand that all of this data was produced by Commission staff to Defendant.

6. I downloaded the MGT Trading Data into an excel spreadsheet. I searched it for trades made during certain periods: namely (1) the period April 11 through April 16, 2013 (“April MGT Data”); (2) the period February 3 through February 5, 2016 (“February MGT Data”); and (3) the period May 9, 2016 through May 13, 2016 (“May MGT Data”).

7. I searched the April MGT Data by the tax identification numbers for Barry Honig, John Stetson, HS Contrarian Investments LLC, Mark Groussman and Melechdavid, Inc. Appended hereto as Exhibit A is a true and correct copy of the trades for those individuals and entities for the period April 11 through April 16, 2013. To prepare this exhibit, I included only those fields necessary to identify the individuals or entities and their trading for the relevant period.

8. I searched the February MGT Data by the tax identification numbers for Barry Honig, GRQ Consultants, Inc., GRQ Consultants, Inc. Roth 401K FBO Barry Honig, Michael Brauser, Grander Holdings, Inc. 401K, Mark Groussman, Melechdavid, Inc., John Stetson, Stetson Capital Investments, Inc., John O'Rourke, and ATG Capital LLC. Appended hereto as Exhibit B is a true and correct copy of the trades for those individuals and entities for the period February 3 through February 5, 2016. To prepare this exhibit, I included only those fields necessary to identify the individuals or entities and their trading for the relevant period.

9. I searched the May MGT Data by the tax identification numbers for Barry Honig, GRQ Consultants, Inc., GRQ Consultants, Inc. Roth 401K FBO Barry Honig, Michael Brauser, Grander Holdings, Inc. 401K, Mark Groussman, Melechdavid, Inc., John Stetson, Stetson Capital Investments, Inc., John O'Rourke, and ATG Capital LLC. Appended hereto as Exhibit C is a true and correct copy of the trades for those individuals and entities for the period May 9 through May 13, 2016. To prepare this exhibit, I included only those fields necessary to identify the individuals or entities and their trading for the relevant period.

Bluesheet Data Reflecting the Trading of Honig, Brauser, Groussman, Stetson and O'Rourke During the Period 2011 through 2018

10. I was also asked to retrieve Bluesheet Data for the period January 1, 2011 through December 31, 2018 for the following persons and entities across all issuers: Barry Honig

(including GRQ Consultants, Inc., and GRQ Consultants, Inc. Roth 401K FBO Barry Honig), Michael Brauser (including Grander Holdings, Inc., Grander Holdings Inc. 401K, Marlin Capital Investments LLC and Birchtree Capital LLC¹), Mark Groussman (including Melechdavid, Inc.), John Stetson (including Stetson Capital Investments, Inc., HS Contrarian Investments LLC, and Oban Investments, LLC²), John O'Rourke (including ATG Capital LLC), and Jonathan Honig (including Four Kids Investments Fund LLC). I understand that all of this data was produced by Commission staff to Defendant.

11. I reviewed that data and was able to ascertain which issuers Brauser, Groussman, Stetson and O'Rourke (and/or their entities) had traded in at or about the same time (within weeks of each other) as Honig, indicating that Honig and those individuals (and their entities) had investments in the same issuers at or about the same time. Appended hereto as Exhibit D is a true and correct copy of the results of that review: a chart that lists the 179 issuers that one or more of Brauser, Groussman, Stetson or O'Rourke held shares in at or about the same time as Honig.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 30, 2023
New York, New York

s/Stephen Johnson
Stephen Johnson

¹ From the Bluesheet Data I reviewed, I understand that both Marlin Capital Investments LLC and Birchtree Capital LLC are Brauser entities.

² From the Bluesheet Data I reviewed, I understand that Oban Investments, LLC is a Stetson entity.